



Edward D. Greim  
Direct Dial: (816) 256-4144  
edgreim@gravesgarrett.com

January 31, 2020

**VIA ECF**

Hon. John G. Koeltl  
Daniel Patrick Moynihan  
United States Courthouse  
Courtroom 14A  
500 Pearl Street  
New York, New York 10007

**Re: Eastern Profit Corp. Ltd. v. Strategic Vision US, LLC, Case No. 18-cv-2185 (JGK)-DCF**

Dear Judge Koeltl:

I write jointly on behalf of the parties to this action to respectfully request that Your Honor reset the pre-motion conference for this case. That conference, originally set for January 14, 2020, was adjourned “pending the resolution of matters related to discovery by the Magistrate Judge.” Dkt. 242. While we continue to review and receive responsive discovery resulting from the Magistrate Judge’s January 14, 2020 Order, those discovery issues before the Magistrate Judge have been resolved.

The parties hereby incorporate their prior submissions to you regarding their proposed summary judgment motions. *See* Dkt. Nos. 199 and 241 (Eastern Profit’s request and Strategic Vision’s response); Dkt. Nos. 237, 240, and 241 and (Strategic Vision’s request and Eastern Profit’s response). We ask your leave to accept these prior submissions, together with this letter, as each party’s request for a pre-motion conference.

The parties have also conferred on a potential briefing schedule which we believe would group similar issues and minimize any duplication on the cross-motions. It would proceed as follows:

Filing 1 (10 days after the pre-motion conference):

- Eastern files a motion for summary judgment as to (a) Strategic Vision’s breach of contract claim (Count I) and Eastern’s declaratory judgment claim (Count III) and (b) Strategic Vision’s fraud claim (Count II).
- Strategic Vision files a motion for summary judgment as to Eastern’s breach of contract claim (Count I), fraud claim (Count II), and unjust enrichment claim (Count IV).

Filing 2 (approximately 30 days later):



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- Eastern files an opposition to Strategic Vision's motion as to Eastern's breach of contract claim (Count I), fraud claim (Count II), and unjust enrichment claim (Count IV).
- Strategic Vision files a response and/or cross-motion as to (a) Strategic Vision's breach of contract claim (Count I) and Eastern's declaratory judgment claim (Count III), and (b) Strategic Vision's fraud claim (Count II).

Filing 3 (approximately 30 days later):

- Each side files its response or reply, as applicable.

Filing 4 (approximately 24 days later):

- Strategic Vision files any reply in support of its own motions under Filing 2.

Respectfully submitted,

Edward D. Greim  
Attorneys for Defendant/Counterclaimant

cc: Counsel of record via ECF